DRAFT CRITICAL COMPONENTS OF QUALITY INDICATORS FOR THE PROVISION OF ACCESSIBLE EDUCATIONAL MATERIALS AND ACCESSIBLE TECHNOLOGIES IN WORKFORCE DEVELOPMENT

# QUALITY INDICATOR 1

The agency has a coordinated system for the provision of appropriate, high-quality accessible materials and technologies for all customers with disabilities who require them.

## Intent

If a customer with disabilities needs accessible materials and technologies, an agency cannot deny provision for any reason (e.g., type of disability, copyright eligibility, type of format needed, administrative concerns, fiscal concerns).

### Critical Components

To effectively address this quality indicator, the following components should be present across a coordinated system for the provisions of accessible materials and technologies.

A means for ensuring the provision of print materials (e.g., printed textbooks, manuals, handouts) in high quality accessible specialized formats and accessible technology to deliver them (e.g., electronic braille reader, text to speech program, audio player)

* Braille to customers who require this format
* Large print to customers who require this format
* Audio to customers who require this format
* Digital text to customers who require this format

A means for ensuring digital materials that are

* Procured from free and commercial sources meet accessibility standards, such as WCAG 2.0 (minimum level AA compliance) and Section 508 (or Section 508 Refresh once approved)
* Selected and acquired by staff or others for communication, training and other purposes are accessible
* Created by staff or others (e.g., documents, web pages, video) are accessible

A means for ensuring technologies are either directly usable without assistive technology or made usable with assistive technology by

* Procuring free and commercial technologies that meet WCAG 2.0 AA and Section 508 accessibility standards
* Selecting and acquiring accessible technologies for communication, training and other purposes by staff and others

A means for ensuring the provision of accessible materials and technologies with appropriate protection and management of digital rights as mandated by the Chafee Amendment to customers who qualify under

ADA Titles I, II, III

Section 188 of WIOA

Collaborations, internal and external, that are important to developing and sustaining a coordinated system of sources for accessible materials and technologies

# QUALITY INDICATOR 2

The agency supports the acquisition and provision of appropriate accessible materials and technologies *in a timely manner.*

## Intent

In general, “timely manner” means that customers who require accessible materials and technologies receive them at the same time that non-disabled peers receive materials and technologies. Appropriate consideration is given to factors that could delay timely delivery. Agencies have clearly defined policies and procedures to identify and address sources of delay.

### Critical Components

To effectively address this quality indicator, the following components should be present when addressing timely manner.

An agency definition of timely manner as stipulated by ADA Title I or Title II, Section 504 of the Rehabilitation Act, and Section 188 of WIA/WIOA

A means for ensuring timely delivery

* Tracking timely delivery (e.g., maintenance of records of delivery of accessible materials to customers who need them; customer satisfaction feedback)
* Requiring a widely communicated process for requesting, identifying and providing accommodations effectively and efficiently to customers who need them
* Including timelines in purchasing agreements with publishers and technology vendors
* Procuring accessible materials and technologies that are available
* Requiring that staff select, acquire, and use accessible materials and technologies
* Requiring that staff use accessibility practices when creating materials (e.g., notices, brochures, web pages and other internally-prepared materials)
* Identifying delays to timely manner (e.g., late selection of materials; failure to include digital accessibility language in purchasing contracts; failure to procure accessible materials that are available; inefficiencies in the process to provide accommodations; unavailability or lack of use of AT or other content delivery devices; lack of training on how to select, create, and use accessible materials and technologies)
* Correcting identified delays

Collaborations, internal and external, that are important to the timely delivery of accessible materials and technologies

# QUALITY INDICATOR 3

The agency develops and implements *written guidelines* related to effective and efficient acquisition, provision, and use of accessible materials and technologies.

## Intent

Written guidelines include the roles, knowledge, skills, actions, alignment, and coordination required for delivery of accessible materials and technologies in a timely manner. Guidelines are communicated in multiple ways (e.g., webinars, infographics, websites) and broadly disseminated to ensure that all responsible parties can understand and apply them.

### Critical Components

To effectively address this quality indicator, the following components should be included in the development and dissemination of written guidelines.

Guidelines that explain relevant federal, state, and local policies (e.g., statutory and regulatory requirements including but not limited to timely provision; technology accessibility standards; provision of reasonable accommodations; copyright protection and management of print and digital materials; definitions)

Guidelines for overall processes implemented by the agency for providing accessible materials and technologies for all customers with disabilities who need them

* Process for requesting and receiving accommodations
* Process used to provide accessible formats and/or features for equal access
* Inclusion of examples of related accommodations
* Inclusion of accommodations related to accessible materials and technologies when appropriate in customers’ Individual Employment Plans
* Notation of where to go for help

Guidelines for overall processes for providing accessible materials and technologies for all customers

* Priority selection of accessible materials and technologies in procurement procedures, including digital accessibility language in RFPs and purchasing contracts
* Procedures for selecting or creating accessible digital materials (e.g., accessible documents, closed captioning, audio description services)

Guidelines for delineating duties and responsibilities at all levels of the agency

* Front line and supervisory staff
* Case managers, job trainers, counselors, and other staff
* WIOA-required and other workforce partner front line and supervisory staff at the AJC
* Equal Opportunity (EO) Officer
* Disability Resource Coordinator
* Section 504 Coordinator
* Information and communication technology staff
* Purchasing/procurement staff
* Customers

Guidelines represented in multiple formats (e.g., print, digital, audio, electronic or embossed braille) and widely disseminated through multiple means (e.g., website, policy manuals, handouts)

Collaborations, internal and external, that are important to the development and dissemination of guidelines

# QUALITY INDICATOR 4

The agency provides or arranges for *comprehensive learning opportunities and technical assistance* that address all aspects of the need, selection, acquisition and use of accessible materials and technologies.

## Intent

Ongoing learning opportunities and technical assistance draw from multiple sources, are offered in different forms (e.g., orientations, workshops, briefs, webinars, book studies) and range from introductory to advanced to reach all stakeholders.

### Critical Components

To effectively address this quality indicator, the following components should be included in learning opportunities and technical assistance.

Targeted topics that provide all involved individuals with the awareness, knowledge, and skills needed to fulfill their responsibilities (e.g., legal issues, policies and procedures, provision of reasonable accommodations, copyright and management of accessible materials, structure and utility of formats, technology systems and updates, acquisition sources, implementation practices)

Intended audiences include, but are not limited to

* Front line and supervisory staff
* Disability Resource Coordinator
* Equal Opportunity (EO) Officer
* Disability Employment Initiative (DEI) personnel
* Section 504 Coordinator
* Instruction and information technology
* Counselors, job coaches, and related staff
* Eligible training providers
* Materials and technology procurement personnel
* Customers
* Community or advocacy organizations
* Schools that provide services and supports
* Families
* Community college liaisons
* Special education transition specialists
* Workforce partners
* State vocational rehabilitation agency counselors
* Service coordinators and case managers
* Local disability providers
* Integrated Resource Teams (IRTs)
* Contractors and serviced providers
* Employers
* Any other persons or entities with which the agency works to carry out its job training programs

Designed in ways that

* Leverage local, state, and national resources
* Consider the roles and responsibilities of the intended audience
* Use multiple means and formats for delivery (e.g., in person workshop, webinar, video, brochure, website, handouts, electronic newsletter)
* Meet accessibility guidelines (e.g., accessible website and digital materials; closed captioning of video and transcripts of audio; live captioning for webinars; multiple formats of print materials)
* Acknowledge readiness levels of participants (e.g., beginner, intermediate, advanced)
* Vary in intensity and duration as appropriate to the topic and audience
* Are integrated with staff performance evaluations
* When provided to customers, allow the use of Individual Training Accounts (ITAs)

Collaborations, internal and external, that are important to capacity building on all aspects of accessible materials and technologies

# QUALITY INDICATOR 5

The agency develops and implements a *systematic data collection process* to monitor and evaluate the equitable, timely provision of appropriate, high-quality accessible materials and technologies.

## Intent

Data are collected that measure the degree to which accessible materials and technologies provide all customers with disabilities with the opportunity to acquire the same information, engage in the same interactions and benefit from the same services as customers without disabilities with substantially equivalent ease of use.

### Critical Components

To effectively address this quality indicator, the following components should be present in a systematic process to evaluate all aspects of the system.

Strategies for collecting data on the extent to which customers effectively receive appropriate, high-quality accessible materials and technologies in a timely manner

* Customer demographics (e.g., number of individuals with disabilities; number receiving accommodations; number of minorities)
* Number of customers provided accommodations that include accessible materials, accessible technologies and related assistive technology; for this population, include

Disability categories

Demographics

Formats provided

Identification of sources used

Timely delivery

Quality of materials (e.g., accuracy of coding and content, ease of use)

* Client feedback (e.g., meetings, interviews, conversations, surveys)

Strategies for collecting data on the legal compliance of materials and technologies

* Records on compliance with copyright in the management and use of accessible materials
* Records on materials procured that meet minimum accessibility standards (WCAG 2.0/Section 508)
* Records on technologies procured that meet minimum accessibility standards (WCAG 2.0/Section 508)

Strategies for collecting data on learning opportunities and technical assistance provided to stakeholders

* Providers
* Delivery formats (e.g., in person, webinar, videos, virtual communities)
* Evidence of impact on overall training program (e.g., records of timely delivery; customer satisfaction with accessibility of materials and technologies; equitable provision across disability categories and demographics; extent of the accessibility of materials and technologies directly procured from publishers and vendors)

A plan for collecting and maintaining data on customer use of accessible materials and technologies

* Data-sharing agreements with WIA/WIOA partners and other delivery systems (consistent with privacy and confidentiality policies)
* Collection methods
* Selection of a management information system that supports

Legal requirements related to customer confidentiality

Monitoring of use of accessible materials and technologies by individual customers with related accommodations

Cross-referencing data on individual use with data on disability categories served

Cross-referencing data on individual use with data on other customer population demographics

* Data collection timelines
* Responsible party

Collaborations, internal and external, that are important to developing and implementing a systematic data collection process

# QUALITY INDICATOR 6

The agency *uses the data collected to guide changes* that support continuous improvement in all aspects of the systemic provision and use of accessible materials and technologies.

## Intent

Data are systematically analyzed to gauge effectiveness of all aspects of the current system and are used to inform actions needed to improve future practice, program planning and resource allocation.

### Critical Components

To effectively address this quality indicator, the following components should be present when analyzing and using data.

A specific plan for analyzing and using the data, including, but not limited to

* Purpose for which the data will be used
* Development of a sharing agreement with WIA/WIOA partners and other service delivery systems
* Strategies for both quantitative and qualitative analysis
* Strategies that protect individual customer identities
* Timeline for periodic review of data
* Timeline for implementation of data driven decisions

Participation in analysis of data by various stakeholders, for example

* Front line and supervisory staff
* Disability Resource Coordinator
* Service coordinators and case managers
* Eligible training providers
* Integrated Resource Teams (IRTs)
* Equal Opportunity (EO) Officer
* Disability Employment Initiative (DEI) personnel
* Section 504 Coordinator
* MIS administrators

Strategies for cross-referencing data on timely delivery of high quality accessible materials and technologies with data on job placement of customers with related accommodations

Strategies for cross-referencing data to determine equity in the provision of accessible materials and technologies

* Cross-referencing customer use data with data on disability categories served
* Cross-referencing customer use data with customer population demographic data

Multiple means for dissemination of results to targeted audiences

Use of data to improve future practice, program planning and resource allocation

Collaborations, internal and external, that are important to using data to inform changes in the provision of accessible materials and technologies

# QUALITY INDICATOR 7

The agency *allocates resources* sufficient to ensure the delivery and sustainability of quality services to customers with disabilities who need accessible materials and technologies.

## Intent

Sufficient fiscal, human, and infrastructure resources are committed to ensure that customers’ needs are appropriately addressed (e.g. determination of need, provision of appropriate accessible materials and technologies, delivery of services, learning opportunities for all stakeholders).

### Critical Components

To effectively address this quality indicator, the following components should be included in allocating resources.

Multiple resource types are provided, including, but not limited to

* Fiscal (e.g., funds are allocated for equitable provision of accessible materials and technologies to all customers who need them)
* Human (e.g., staff at multiple levels with knowledge to assist with selection, procurement, acquisition, and integration of accessible materials and technologies in all program services)
* Infrastructure (e.g., databases, coordinated provision systems, information and communication technology, assistive technology, training)

Resources are used to address the needs of all stakeholders, including, but not limited to

* All customers being served
* Staff
* Service providers
* Partners
* Contractors
* Employers
* Families

Collaborations, internal and external, that are important to leveraging resources for the benefit of all stakeholders